

IN THE UNITED STATES DISTRICT COURT
IN THE MIDDLE DISTRICT OF NORTH CAROLINA

CIVIL ACTION NO. 1:24-CV-975

JAMES CAMPBELL,

Plaintiff,

v.

CABARRUS COUNTY BOARD OF
COMMISSIONS; AND STEVE
MORRIS, IN HIS OFFICIAL
CAPACITY AS BOARD
CHAIRMAN,

Defendants

**MOTION FOR EXTENSION OF
TIME TO ANSWER OR
OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

NOW COME Defendants, Cabarrus County Board of Commissioners and Steve Morris, in his official capacity as Board Chairman (“Moving Defendants”), by and through the undersigned counsel and pursuant to Rule 6 of the Federal Rules of Civil Procedure, and LR 6.1(a) of the Rules of Practice and Procedure for the United States District Court for the Middle District of North Carolina, and respectfully request an extension of time to, and including, January 23, 2025, within which to answer or otherwise respond to Plaintiff’s Complaint.

In support of this motion, Moving Defendants show the Court as follows:

1. On or about November 21, 2024 Plaintiff filed his Complaint against Defendants.

2. Defendant Steve Morris, in his official capacity as Board Chairman was served with a copy of the Summons and Complaint on December 3, 2024.

3. Defendant Cabarrus County Board of Commissioners was served with a copy of the Summons and Complaint on December 5, 2024.

4. The time for Moving Defendants to answer or otherwise respond to the Complaint has not yet expired.

5. Moving Defendants and undersigned counsel have not had sufficient time to investigate the allegations in the Complaint. Therefore, Moving Defendants reasonably require additional time to prepare an answer or other respond to the Complaint.

6. This enlargement of time will not substantially delay this proceeding.

7. Undersigned Counsel conferred with Counsel for Plaintiff, who indicated no objection to this motion.

8. This motion is made in good faith and not for the purpose of delay.

WHEREFORE, Moving Defendants respectfully request that the time within which they may answer or otherwise respond to the Complaint be extended to and including January 23, 2025.

This the 20th day of December, 2024.

/s/ JAMES D. MCALISTER

Bar No: 35432

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Attorney for Cabarrus County Board of
Commissioners and Steve Morris, in his
official capacity as Board Chairman

CERTIFICATE OF SERVICE

I hereby certify that on 12/20/24 I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

Email: bdougherty@libertyjusticecenter.org
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/s/ JAMES D. MCALISTER